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December 15, 2023

Judge Malachy E. Mannion
William J. Nealon Federal Building
235 N. Washington Avenue
Scranton, PA 18501

RE: Stacey Wolking v. Henry Lindner, M.D., et al
Our File No.: 01282-00095358-PA030

Dear Honorable Judge Malachy E. Mannion:

I am writing to request a discovery conference in this matter due to some unexpected events that have occurred. The August 21, 2023 Court Order set deadlines, including a fact discovery deadline of February 2, 2024. The deposition of Defendant Henry Lindner, M.D. was scheduled for December 20, 2023. However, this week Dr. Lindner's daughter passed away and the deposition needed to be postponed. Due to the death of his daughter, we are requesting a discovery conference in order to extend deadlines in this matter to allow for more time to conduct depositions. We have reached out to Plaintiffs and Co-Defendant's respective counsels, and they are in agreement with extending the deadlines in this matter.

Very truly yours,

/s/ Ciara L. DeNaples

Ciara L. DeNaples, Esquire

cc: Conrad Benedetto, Esquire, McCormick & Priore, P.C.
Philip D. Priore, Esquire, McCormick & Priore, P.C.
Conor Lamb, Esquire, Kline Specter, P.C.